

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

GENEVA HENDERSON, *et al.*,

Plaintiffs,

v.

EMORY UNIVERSITY, *et al.*,

Defendants.

Civil Action No. 1:16-cv-02920-CAP

**DEFENDANTS' MOTION TO EXCLUDE PROPOSED EXPERT  
TESTIMONY OF WENDY DOMINGUEZ AND GERALD BUETOW**

Defendants Emory University, Emory Healthcare, Inc., the Emory Pension Board, Emory Investment Management, Mary L. Cahill, Mary Beth Allen, Dallis Howard-Crow, Dr. Douglas Morris, James T. Hatcher, Peter Barnes, Carol Dillon Kissal, Edith Murphree, Ronnie Jowers, Jane Jordan, Christian P. Larsen, Maureen Haldeman, and Ira R. Horowitz (collectively, “Emory”) hereby move to exclude the proposed testimony of Plaintiffs’ experts, Wendy Dominguez and Dr. Gerald Buetow, pursuant to Federal Rule of Evidence 702 and governing precedent. In support, Emory relies upon the accompanying Memorandum and exhibits.

WHEREFORE, for the reasons set forth in the Memorandum, Emory respectfully requests that the Court grant its Motion and exclude any proposed testimony from Wendy Dominguez or Dr. Gerald Buetow.

Respectfully submitted this 1st day of October, 2019.

s/ Matthew J. Sharbaugh

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**CERTIFICATE OF COMPLIANCE**

I certify that the foregoing brief has been prepared in accordance with Local Rule 5.1, including preparation in Times New Roman 14-point font, one of the font and point selections approved by the Court in Local Rule 5.1(C).

This 1st day of October, 2019.

*s/ Matthew J. Sharbaugh*  
Matthew J. Sharbaugh

**CERTIFICATE OF SERVICE**

I certify that I caused to be served a true and correct copy of the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties to this matter via electronic notification or otherwise.

This 1st day of October, 2019.

*s/ Matthew J. Sharbaugh*  
Matthew J. Sharbaugh